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10 Attorneys for Defendant
11 Credit One Bank, N.A.

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TONYA JOHNSON, on behalf of herself and
all others similarly situated,

Plaintiff,

vs.

CREDIT ONE BANK, N.A.,

Defendant.

CASE NO.: 2:20-cv-01837-GMN-BNW

**STIPULATION AND ORDER FOR
EXTENSION TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Plaintiff Tonya Johnson (“Plaintiff”) and Defendant Credit One Bank, N.A. (“Credit One”) (collectively, the “Parties”), by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Credit One’s deadline to respond to Plaintiff’s First Amended Class Action Complaint for Violations of the Telephone Consumer Protection Act, 47 U.S.C. §§ 227, et seq. (“TCPA”) (“First Amended Complaint”) [ECF No. 5] to December 8, 2020, for the following reasons:

1. On October 27, 2020, Plaintiff served the First Amended Complaint and Summons on Credit One, and this was the first complaint in this action served upon Credit One.

2. Credit One’s Response is currently due November 17, 2020.

3. Credit One has been investigating the allegations set forth in the Complaint and has provided some initial information to Plaintiff regarding her claims, which Plaintiff intends to review and the parties will be discussing.

1 4. In light of the information provided, and the parties' intention to discuss that
2 information and see if any resolution could be reached, on November 10, 2020, counsel for Plaintiff
3 agreed to stipulate to a 21-day extension of time for Credit One to respond to the Complaint.

4 5. This extension request is sought in good faith and is not made for the purpose of
5 delay.

6 Therefore, the Parties respectfully request an extension for Credit One to respond to
7 Plaintiff's First Amended Complaint up to and including December 8, 2020.

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9 DATED: November 10, 2020

10 KAZEROUNI LAW GROUP, APC

11 By: /s/ Gustavo Ponce

Gustavo Ponce
Nevada Bar No. 15084
Mona Amini
Nevada Bar No. 15381
6069 S. Fort Apache Road, Suite 100
Las Vegas, Nevada 89148

12 Attorneys for Plaintiff Tonya Johnson

DATED: November 10, 2020

SNELL & WILMER L.L.P.

13 By: /s/ Michael Paretti

Michael Paretti
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Las Vegas, Nevada 89169

14 *Attorneys for Defendant Credit One Bank,
15 N.A.*

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17 ORDER

18 **IT IS ORDERED** that Credit One shall respond to Plaintiff's First Amended Complaint on
19 or before December 8, 2020.

20 DATED: November 13, 2020.

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23 UNITED STATES DISTRICT COURT JUDGE